

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Enbridge Pipelines (Illinois), L.L.C.,)	
)	07-0446
Application Pursuant to Section 8-503, 8-509 and)	
15-401 of the Public Utilities Act/The Common)	
Carrier by Pipelines Law to Construct and Operate)	
a Petroleum Pipeline and When Necessary to Take)	
Private Property As Provided by the Law of)	
Eminent Domain.)	

PLIURA INTERVENORS' RESPONSE TO
MOTION FOR EXTENSION OF TIME TO RESPOND TO
MOTION TO REOPEN AND AMEND

NOW COME the various landowner and farmer Intervenor in the above-referenced cause who throughout these proceedings have been jointly referred to for convenience purposes as "Pliura Intervenor", by and through their attorneys, Thomas J. Pliura, and in response to the Motion of the County of McLean to extend the time for filing its formal response to Applicant's Motion to reopen, respectfully states as follows;

1. Applicant's Motion to Reopen is an unusual procedural action not authorized by statute or regulation.
2. Any assertion of urgency in resolution of Applicant's motion is belied by the fact that Applicant, itself, delayed moving for amendment of the final order for nearly two years following its 2012 decision to alter the proposed pipeline project to change the capacity, intended product and intended final destination of the product.
3. A brief extension to allow the County of McLean the necessary time to formally respond is appropriate where the County has adequately explained the reasons why it could not meet the prior expedited timeframe and not run afoul of the Open Meetings Act.

4. Therefore, in the interest of assuring due process for all parties, Pliura Intervenors pose NO OBJECTION to the motion for extension of time and urge the honorable Administrative Law Judge to allow McLean County a reasonable amount of time to respond.

Respectfully submitted this 16th day of June, 2014

s/THOMAS J. PLIURA, M.D., J.D.
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PROOF OF SERVICE

The undersigned certifies that on this 16th day of June, he served a copy of the foregoing document together with copies of each Petition to Intervene upon the individuals on the attached service list, by electronic mail.

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